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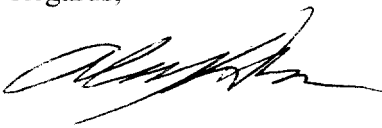
Re.: Proposed Rule  
In the Matter of:  
47 CFR Part 2 and Part 22  
New Advanced Wireless Services  
ET Docket 00-258  
RM-9911  
RM-9920  
FCC 00-455

30 January 2001

Greetings:

Please accept the enclosed comments on the proposed rulemaking in reference to the above captioned subject.

Regards,



Alan Dixon  
CORES FRN 0003-3350-56

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Before the  
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47 CFR Part 2 and Part 22

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GREETINGS:

#### SUMMARY

The above-referenced document (NPRM) explores the possible use of frequency bands below 3 GHz to support the introduction of new advanced wireless services, including third generation ("3G"). In particular, one consideration of this NPRM is to examine use of currently allocated spectrum as it may relate to possible 3G convergence. However, the present technological framework for the Part 22 Cellular Radio Service proves to be completely adequate.

#### CONSIDERATIONS

In reference to FCC 00-455:

##### B. Spectrum Requirements

##### (a) Currently Allocated Spectrum

(Paragraph 6)

The present Cellular Radio Service operating in the bands in the 800-900 MHz spectrum range must remain unchanged in its clearly articulated mission to primarily provide basic mobile telephone service to consumers. (This basic cellular service is sometimes referred to by its industry acronym, *AMPS* [Advanced Mobile Telephone Service].)

Section 22.901 of FCC Part 22 clearly states that, “Cellular system licensees must provide cellular mobile radiotelephone service upon request to all cellular subscribers in good standing, including roamers, while such subscribers are located within any portion of the authorized cellular geographic service area ... where facilities have been constructed and mobile service to subscribers has commenced.”

Further, basic cellular service is required to be provided, subject to the provision of §22.901: “Cellular carriers that provide mobile services must make such service available to subscribers whose mobile equipment conforms to the cellular system compatibility specification (see Sec. 22.933).”

The Section 22.933, Cellular system compatibility specification, defines the premise of basic cellular service as such: “... equipment used in the Cellular Radiotelephone Service must be designed in compliance with the technical specifications for compatibility of mobile and base stations in the Cellular Radiotelephone Service contained in “Cellular System Mobile Station-Land Station Compatibility Specification” (April 1981 Ed.), Office of Engineering and Technology Bulletin No. 53. This bulletin is contained in Appendix D to the Report and Order in CC Docket No. 79-318, and was published in the Federal Register of May 21, 1981.”

Additionally, §22.915 specifies the modulation requirements for basic cellular service: Cellular systems must be capable of providing service using the types of modulation described in the cellular system compatibility specification.” [Referenced above.] Further, §22.917 describes the spectral characteristics of the standard FM (F3E) emissions used in the Cellular Radiotelephone Service. This is the core essence of our nations fundamental mobile telephone service.

According to recent statistics from the Cellular Telephone and Internet Association (CTIA), 52.5 % of cellular telephone subscribers are conventional AMPS service users. (<[http://www.wow-com.com/consumer/faqs/faq\\_general.cfm](http://www.wow-com.com/consumer/faqs/faq_general.cfm)>, CTIA: Jan. 26, 2001.) It is paramount to note that due to the disparate family of wireless telephone technical standards in the United States and elsewhere, AMPS has become the default roaming standard for the entire Western Hemisphere. The coming 3G standards offer no alternative roaming standard.

Without AMPS as a universally available service in the 800 MHz Cellular bands, the nationwide ubiquitous roaming that consumers enjoy today would become, and remain for all of the foreseeable future, an impossibility!

Our nation’s AMPS system has proven to be substantially robust in the 15-plus years of its existence. AMPS service is simple and effective. Further, contrary to some “conventional wisdom” within the industry, not all cellular subscribers want, need, or expect such non-telephone amenities as text messaging, unsolicited textual and graphic advertising (“spam”),

video, and Internet Web browsing. Clearly, a substantial portion of wireless telephone subscribers in the US prefer basic AMPS cellular telephone service.

It is imperative therefore, that a sufficient portion of the 800 MHz cellular bands remain reserved in coprimary service for basic AMPS cellular subscribers and especially, roamers.

To the credit of industry improvements and for those subscribers wanting additional service features, §22.901(d) already provides that: “Licensees of cellular systems may use alternative cellular technologies and/or provide fixed services on a co-primary basis with their mobile offerings, including personal communications services (as defined in Part 24 of this chapter) on the spectrum within their assigned channel block. Cellular carriers that provide mobile services must make such service available to subscribers whose mobile equipment conforms to the cellular system compatibility specification (see Sec. 22.933 [Referenced above.]).” Given this, both cellular carriers and cellular subscribers have a freedom of choice of technological offerings within the 800 MHz Cellular Radio Service bands.

## CONCLUSION

Sections 22.901 and 22.933 of FCC Part 22 should be left as written. The existing Cellular Radio Service regulations are minimally intrusive, fair, offer consumer and marketplace choice, and are technology agnostic in accommodating both existing and emerging equipment and technological protocols.

Signed by me this 30<sup>th</sup> day of January 2001,



Alan Dixon

Industry-recognized senior telecommunications engineer

Contributing Editor, Popular Communications magazine

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